

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Application Review

Issue Date: **TBD**

Region: Winston-Salem Regional Office
County: Davidson
NC Facility ID: 2900257
Inspector's Name: Taylor Hartsfield
Date of Last Inspection: 06/01/2017
Compliance Code: 3 / Compliance - inspection

Facility Data Applicant (Facility's Name): Halyard Health, Inc. Facility Address: Halyard Health, Inc. 389 Clyde Fitzgerald Road Linwood, NC 27299 SIC: 2297 / Nonwoven Fabrics NAICS: 31323 / Nonwoven Fabric Mills Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V				Permit Applicability (this application only) SIP: 02D: .0503, .0515, .0516, .0521, .0524, .1100, .1806 02Q: .0711 NSPS: Dc, JJJ NESHAP: ZZZZ PSD: n/a PSD Avoidance: n/a NC Toxics: 02D .1100 112(r): Other: 02D .0958 removed.					
Contact Data				Application Data					
Facility Contact Eddie Motsinger Professional Senior Safety Consultant (336) 248-7332 389 Clyde Fitzgerald Road Linwood, NC 27299	Authorized Contact Richard Tucker Plant Manager (336) 248-7301 389 Clyde Fitzgerald Road Linwood, NC 27299	Technical Contact Eddie Motsinger Professional Senior Safety Consultant (336) 248-7332 389 Clyde Fitzgerald Road Linwood, NC 27299	Application Number: 2900257.17A Date Received: 06/01/2017 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 05635/T14 Existing Permit Issue Date: 02/27/2015 Existing Permit Expiration Date: 03/31/2018						
Total Actual emissions in TONS/YEAR:									
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP		
2015	0.0900	10.11	69.76	9.46	5.58	2.35	1.43 [Hexane, n-]		
2014	0.0800	7.59	67.43	7.07	5.93	2.76	1.59 [Hexane, n-]		
2013	0.0650	5.97	59.63	5.47	5.99	2.89	1.67 [Hexane, n-]		
2012	0.0700	6.35	65.55	5.75	5.99	2.53	1.36 [Hexane, n-]		
2011	0.0500	7.77	62.11	6.46	6.09	2.54	1.34 [Hexane, n-]		
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; vertical-align: top;"> Review Engineer: Russell Braswell Review Engineer's Signature: _____ Date: _____ </td> <td style="width: 50%; vertical-align: top;"> Comments / Recommendations: Issue 05635/T15 Permit Issue Date: TBD Permit Expiration Date: TBD </td> </tr> </table>								Review Engineer: Russell Braswell Review Engineer's Signature: _____ Date: _____	Comments / Recommendations: Issue 05635/T15 Permit Issue Date: TBD Permit Expiration Date: TBD
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1. Purpose of Application

Halyard Health, Inc (HHI) currently operates a facility in Linwood, NC under Title V Air Quality Permit 05637T14. This permit has an expiration date of March 31, 2018. HHI submitted this permit application in order to renew the existing Title V permit. Because this application was received at least nine months before the expiration date of the existing permit, the permit will not expire until this application is processed.

In addition to renewing the permit, this application proposes some minor changes to the permit.

2. Facility Description:

According to the most recent inspection report, this facility uses polypropylene to produce nonwoven fabric products for the medical industry. Examples include gowns and linens. The facility tends to operate on a 24/7 basis.

3. History/Background Since the Previous Permit Renewal:

- April 24, 2013 Permit T12 issued. This action renewed the permit and made corrections to the permitted emission source list and TAP limits in the permit.
- November 17, 2014 Permit T13 issued. This action changed the name on the permit (Halyard Health, Inc.—Linwood).
- February 27, 2015 Permit T14 issued. This was a TV-Minor modification that upgraded source LX-1.

4. Application Chronology:

- June 1, 2017 Application received.
- July 24, 2017 Email sent to Jake Rucker and Eddie Motsinger requesting additional information regarding the application.
- August 1, 2017 Jake Rucker sent the requested additional information via email.
- August 8, 2017 An initial draft of the permit and review were sent to DAQ staff (Tom Anderson, Mark Cuilla, Samir Parekh, Taylor Hartsfield, and Murphy Davis) and HHI staff (Jake Rucker and Eddie Motsinger). For a summary of comments received on the initial draft, see Attachment 2.
- August 29, 2017 Email sent to Jake Rucker and Eddie Motsinger regarding the number of spunbound and meltblown banks in Lines 2 and 3. He responded later that day.
- XXXX Public / EPA notice
- XXXX Permit issued.

5. Permit Modifications/Changes and TVEE Discussion:

Added emission sources to the insignificant activities list based on applicant's request.

Removed 02D .0958 because this rule no longer applies to this facility.

The list of changes to the permit can be found in Attachment 1.

6. Regulatory Overview:

HHI is subject to the following regulations, in addition to the requirements in the General Conditions:

- 15A NCAC 02D .0503 "Particulates from Fuel Burning Indirect Heat Exchangers"
- 15A NCAC 02D .0515 "Particulates from Miscellaneous Industrial Processes"
- 15A NCAC 02D .0516 "Sulfur Dioxide from Combustion Sources"
- 15A NCAC 02D .0521 "Control of Visible Emissions"
- 15A NCAC 02D .0524 "New Source Performance Standards" (40 CFR Part 60, Subpart Dc)
- 15A NCAC 02D .1100 "Control of Toxic Air Pollutants"
- 15A NCAC 02D .1806 "Control and Prohibition of Odorous Emissions"
- 15A NCAC 02Q .0711 "Emission Rates Requiring a Permit"
- 40 CFR Part 60, Subpart JJJJ "Standards of Performance for Stationary Spark Ignition Internal Combustion Engines"
- 40 CFR Part 63, Subpart ZZZZ "NESHAP for Stationary Reciprocating Internal Combustion Engines"

An extensive review for the following regulations is not included in this document, as the facility's status with respect to them has not changed: 15A NCAC 02D .0503, .0515, .0516, .0521, and .1806.

The permit will be updated to reflect the most current stipulations for all applicable regulations.

7. Rules Review:

a. New Source Performance Standards (NSPS; 40 CFR Part 60)

1. Subpart Dc "Small Industrial-Commercial-Institutional Steam Generating Units"

This rule applies to boilers constructed after 1989 and with a capacity of $10 < n < 100$ million Btu per hour. Of the two boilers at this facility, only LB4 is subject to this rule.

For a natural gas-fired boiler, the facility is only required to keep monthly records of fuel used in the boiler.

HHI appeared in compliance with this rule during the previous inspection. Continued compliance is expected.

2. Subpart IIII "Stationary Compression Ignition Internal Combustion Engines"

This rule applies to compression ignition engines constructed after June 2006. The only compression ignition engine at this facility was constructed before the applicable date, so this rule does not apply.

3. Subpart JJJJ "Stationary Spark Ignition Internal Combustion Engines"

This rule applies to spark ignition engines constructed after June 2006. The only such engine at this facility is I5.

For engines of this type and size, the only requirements under the rule are to purchase a certified engine, operate according to manufacturer's recommendations, and install an hour meter.

Note that this rule only applies to sources on the list of insignificant activities. Therefore, the permit will not contain a specific condition for NSPS Subpart JJJJ.

HHI appeared in compliance with this rule during the previous inspection. Continued compliance is expected.

b. Generally Available Control Technology (GACT; 40 CFR Part 63)

This facility is not a Major Source for HAP emissions. Furthermore, this facility has not taken a limit to avoid Major Source designation.

The following rules under 40 CFR Part 63 are not applicable to this facility because, while they cover emission sources at this facility, they only apply to Major Sources:

- Subpart OOOO: Printing, Coating, and Dyeing of Fabrics and Other Textiles
- Subpart DDDDD: Industrial, Commercial, and Institutional Boilers and Process Heaters

1. Subpart ZZZZ "Stationary Reciprocating Internal Combustion Engines"

This rule applies to all stationary internal combustion engines. The requirements of the rule differ based on the size, fuel type, and use-profile of the engine. For engines also subject to an NSPS, the only requirement under this rule is to comply with that NSPS.

For a diesel-fired emergency generator, this rule has the following general requirements:

- 1) perform regular maintenance
- 2) install an hour meter
- 3) use low-sulfur fuel, and
- 4) operate with good work practices.

Note that this rule only applies to sources on the list of insignificant activities. Therefore, the permit will not contain a specific condition for GACT Subpart ZZZZ.

HHI appeared in compliance with this rule during the previous inspection. Continued compliance is expected.

2. Subpart JJJJJ "Industrial, Commercial, and Institutional Boilers Area Sources"

This rule applies to boilers at area sources of HAP. However, the rule does not apply to boilers fired only with natural gas. All of the boilers at this facility are fired with natural gas, so this rule does not apply.

c. Prevention of Significant Deterioration (PSD)

This facility has not undergone a PSD review. Furthermore, this facility is not avoiding triggering a PSD review.

d. Section 112(r) of the Federal Clean Air Act

The facility does not appear to store any 112(r)-subject materials above their respective thresholds. Therefore, the facility does not have any increased requirements under Section 112(r) of the Clean Air Act.

e. Reasonably Available Control Technology (RACT)

The facility is not located in an area of ozone nonattainment, therefore RACT does not apply.

f. Compliance Assurance Monitoring (CAM)

CAM applies to control devices. Given that there are no control devices at this facility, CAM does not apply.

g. State Implementation Plan rules

According to 02D .0902(f), the rules contained in the 02D .0900 section only apply to facilities in areas of ozone nonattainment. Given that this facility is not located in an area of ozone nonattainment, rules in the 02D .0900 section do not apply to this facility.

The previous permit included a condition for 02D .0958. Because this rule no longer applies to this facility, this condition has been removed from the permit.

8. Toxic Air Pollutants (TAPs)

This facility has been reviewed for TAP emission rates, and has submitted air dispersion modeling (most recently on January 8, 2010) in order to demonstrate compliance with allowable ambient levels (AALs).

In order to demonstrate continued compliance with the AALs, the facility must limit the throughput of each of its fabric manufacturing lines and limit the facility-wide natural gas consumption. Records of production and fuel use must be kept and reported regularly.

Furthermore, the facility has demonstrated that, while it does emit certain TAPs, their emissions do not warrant modeling to demonstrate compliance with the AALs. These TAPs are listed in a permit condition for 02Q .0711.

9. Facility Emissions Review

This permit renewal does not change any sources listed in the Permitted Emission Source list.

Each of the changes to the Insignificant Activities list meet the criteria of 02Q .0503(8) (i.e. less than five tons per year of any criteria pollutant and less than 1,000 pounds per year of total HAP).

For a historical summary of actual emissions from this facility, see the table on the first page of this review. The data contained therein is taken from the facility's annual Emission Inventory submissions.

10. Compliance Status

- a. Notices of Violation/Recommendation for Enforcement since the previous renewal

None.

- b. Inspection status

This facility was most recently inspected on June 1, 2017 by Taylor Hartsfield. HHI appeared to be in compliance with the permit at the time of that inspection.

11. Other Regulatory Concerns

A PE seal was not required for this permit renewal.

A zoning consistency form was not required for this permit renewal.

12. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also, pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice is provided to the public under 02Q .0521 above. Virginia and Forsyth County are affected state/local programs within 50 miles of the facility.

13. Recommendations

Issue permit 05635T15.

Change List

INSERT CHANGE LIST FROM FINAL PERMIT

DRAFT

Comments Received on Initial Draft

- Taylor Hartsfield, by email on August 10, 2017

1. Taylor pointed out an omission in the summary table for Section 2.2 A.

Response: Fixed.

2. Taylor suggested that the equipment list count the number of banks in Lines 2 and 3. The equipment list already does this for Lines 1 and 4, so it makes sense that Lines 2 and 3 have this as well.

Response: In an email to Eddie Motsinger, he confirmed that:

- a) Line 2 has two Spunbond banks and four Meltblown banks and
- b) Line 3 has two Spunbond banks.

I have updated the permitted emission source list to reflect this.

- Eddie Motsinger, by email on August 14, 2017

1. Eddie pointed out that the Authorized Official needs to be updated in the permit.

Response: Fixed.

2. Eddie requested that the insignificant generator be labeled with its input capacity (256 kW), not its electrical output capacity (60 kW).

Response: Fixed.

- Mark Cuilla, by email on August 25, 2017

1. Mark pointed out typos in the permit and review.

Response: Fixed.